



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

CERTIFIED MAIL #7099 3220 0006 2681 4988

April 22, 2002

Mr. Gil Dayley
Quality Control Manager
Idaho Supreme Potatoes, Inc.
P.O. Box 246
Firth, Idaho 83236-0246

RE: T2-010314, Idaho Supreme Potatoes, Inc., Firth, Idaho
Final Tier II Operating Permit No. 011-00013

Dear Mr. Dayley:

The Idaho Department of Environmental Quality (Department) is issuing Tier II Operating Permit No. 11-00013 for the Idaho Supreme Potatoes, Inc. Firth Facility located in Firth, Idaho in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II permit is based on the information contained in your application and on the relevant comments received during the public comment period. This Tier II permit is effective immediately and supercedes your previous permit issued on December 23, 1998. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Larry Sims of the Pocatello Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Mike Simon at (208) 373-0502 to address any concerns you may have with the enclosed permit.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KK/MJS/bh

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Enclosure

cc: Larry Sims, Pocatello Regional Office
Sherry Davis, Technical Services
Laurie Kral, EPA Region 10
Joan Lechtenbeg, Air Quality Division



**Air Quality
TIER II OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: 011-00013

AQCR: 61

CLASS: A

SIC: 2034

ZONE: 12

UTM COORDINATE (km): 404.8, 4795.9

1. PERMITTEE

Idaho Supreme Potatoes, Inc.

2. PROJECT

Firth Facility

3. MAILING ADDRESS

P.O. Box 246

CITY

Firth

STATE

ID

ZIP

83236-0246

4. FACILITY CONTACT

Gil Dayley

TITLE

Quality Control Manager

TELEPHONE

(208) 346-4168, ext. 112

5. RESPONSIBLE OFFICIAL

Wade Chapman

TITLE

General Manager

TELEPHONE

(208) 346-4168, ext. 105

6. EXACT PLANT LOCATION

Corner of Highway 91 and 800 N. Goshen Highway

COUNTY

Bingham

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Dehydrated Potato Processing Plant

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

April 22, 2002

DATE EXPIRES::

April 22, 2007

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LIST OF ACRONYMS

AQCR	Air Quality Control Region
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
CO	carbon monoxide
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic feet
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
lb/MMBtu	pound per million British thermal units
LPG	liquefied propane gas
MMBtu/hr	Million British Thermal Units Per Hour
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
OP	operating permit
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
scf/hr	standard cubic feet per hour
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 011-00013**Permittee:** Idaho Supreme Potatoes, Inc.**Date Issued:** April 22, 2002**Location:** Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy**Date Expires:** April 22, 2007**1. TIER II OPERATING PERMIT SCOPE****Purpose**

1.1 This Tier II OP establishes facility-wide requirements to limit the facility's potential to emit below Prevention of Significant Deterioration (PSD) emission rates and to comply with ambient air quality standards in accordance with *Rules for the Control of Air Pollution in Idaho*. Modifications at the facility that are permitted in this Tier II OP have qualified the facility as a Tier I major source.

1.2 This Tier II permit supersedes the following permits:

PTC No. 011-00013, issued May 4, 1995

PTC No. 011-00013, issued September 22, 1995

Tier II OP No. 011-00013, issued January 16, 1996

Tier II OP No. 011-00013, issued December 23, 1998

Regulated Sources

1.3 Table 1.1 below lists all sources of emissions that are regulated in this Tier II OP:

Table 1.1 EMISSION SOURCES

Permit Sections	Source Description	Emissions Control(s)
2.12	One 16,000-gallon AST containing fuel oil Two 30,000-gallon ASTs containing fuel oil One 10,000-gallon AST containing No. 2 distillate oil One 20,000-gallon AST containing No. 2 distillate oil	None
3	Boiler No. 4; Bigelow boiler with Coen 200 Series CSI NO _x Mixer Size 34 burner; ~ 140 MMBtu/hr	None
4	Boiler No. 3; Cleaver Brooks Model WT200X-BR3; ~ 43.03 MMBtu/hr	None
5	Fluidized Bed Dryer; Maxon 435 Oven Pak II; ~ 7 MMBtu/hr	None
5	Dryer; National Maxon NP-1 with three stages – Stage A (~ 8 MMBtu/hr); Stage B (~ 3.2 MMBtu/hr); and Stage C (~ 3.2 MMBtu/hr)	None
5	Secondary Dryer; Maxon 405 Ovenpak; ~ 0.55 MMBtu/hr	None
5	Industrial Space Heater South; Maxon NP-1; ~ 8.25 MMBtu/hr	None
5	Industrial Space Heater North; Maxon NP-1; ~ 8.25 MMBtu/hr	None
5	Industrial Space Heater East; Maxon NP-1; ~ 15.4 MMBtu/hr	None
5	Miscellaneous Industrial Space Heaters; Various Manufacturers; ~ 2 MMBtu/hr aggregate	None
6	Process dehydration lines (12 total)	None
6	Storage silos (10 total)	Baghouse filter on each silo

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Date Issued: April 22, 2002

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Date Expires: April 22, 2007

2. FACILITY-WIDE CONDITIONS

Facility Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.
[IDAPA 58.01.01.650-651, 5/1/94]
- 2.2 Unless specified elsewhere in this permit, the permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
[IDAPA 58.01.01.405.01, .07, 5/1/94]
- 2.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint; any corrective action taken; and the date the corrective action was taken.
[IDAPA 58.01.01.405.01, .07, 5/1/94]

Odors

- 2.4 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
[IDAPA 58.01.01.775-776, 5/1/94]
- 2.5 Unless specified elsewhere in this permit, the permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint; any corrective action taken; and the date the corrective action was taken.
[IDAPA 58.01.01.405.01, .07 State-only), 5/1/94]

Visible Emissions

- 2.6 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
[IDAPA 58.01.01.625, 5/1/94]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 011-00013**Permittee:** Idaho Supreme Potatoes, Inc.**Date Issued:** April 22, 2002**Location:** Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy**Date Expires:** April 22, 2007**Excess Emissions**

- 2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.
[IDAPA 58.01.01.130-136]

Reports and Certifications of Documents

- 2.8 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, #300
Pocatello, ID 83201
Phone: (208) 236-6160
Fax: (208) 236-6168

[IDAPA 58.01.01.405.01, .11, 5/1/94]

Open Burning

- 2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Test Methods

- 2.10 If testing is required, the permittee shall use the following test methods described in Table 2.1 to measure the pollutant emissions:

Table 2.1 TEST METHODS

Pollutants	Test Method	Special Conditions
PM ₁₀	EPA Method 201.a.* EPA Method 202	
PM	EPA Method 5*	
NO _x	EPA Method 7*	
SO ₂	EPA Method 6*	
CO	EPA Method 10*	
VOC	EPA Method 25*	
Opacity	EPA Method 9*	If NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or Department-approved alternative in accordance with IDAPA 58.01.01.157

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Location: Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy

Date Expires: April 22, 2007

Fuel-burning Equipment

- 2.11 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas or 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid.

[IDAPA 58.01.01.676-677, 5/1/94]

Sulfur Content

- 2.12 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

2.12.1 ASTM Grade 1 fuel oil - 0.3% by weight.

2.12.2 ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

Fuel Oil Storage Tanks

- 2.13 The permittee shall keep readily accessible records showing dimensions and an analysis showing the capacity of the following storage vessels utilized at the facility: one 16,000-gallon AST containing fuel oil; two 30,000-gallon ASTs containing fuel oil; one 10,000-gallon AST containing No. 2 distillate oil; and one 20,000-gallon AST containing No. 2 distillate oil.

[40 CFR 60.116b(b), 12/14/00]

Permit Application Requirements

- 2.14 The permittee shall submit to the Department a complete application for an original Tier I OP within 12 months of operational start-up.

[IDAPA 58.01.01.313.01.b, 3/23/98]

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Permittee: Idaho Supreme Potatoes, Inc.

Date Issued:

April 22, 2002

Location: Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy

Date Expires:

April 22, 2007

3. BOILER NO. 4

3.1 Process Description

Boiler No. 4 is used in the dehydration process and has a maximum rated heat capacity of approximately 140 MMBtu/hr.

New Source Performance Standards

Emissions of PM, SO₂, and NO_x from Boiler No. 4 are regulated by 40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial - Institutional Steam Generating Units*.

Emissions Limits (NSPS)

3.2 Standard for Particulate Matter

When combusting oil, PM emissions from Boiler No. 4 shall not cause opacity to exceed 20% (six-minute average), except for one six-minute period per hour of not more than 27% opacity. The PM and opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

[40 CFR 60.43b(f) and (g), 10/17/00]

3.3 Standard for Sulfur Dioxide

The permittee shall demonstrate compliance with the sulfur dioxide emission requirements of 40 CFR 60.40b by combusting only very low sulfur fuel as defined in 40 CFR 60.41b, or through alternative methods in accordance with 40 CFR 60.42b.

[40 CFR 60.42b, 10/17/00]

3.4 Standard for Nitrogen Oxides

Emissions of NO_x (expressed as NO₂) from Boiler No. 4 shall not exceed the following limits:

- When combusting natural gas or distillate oil - 0.10 lb/MMBtu (low heat release rate) and 0.20 lb/MMBtu (high heat release rate).
- When combusting residual oil – 0.30 lb/MMBtu (low heat release rate) and 0.40 lb/MMBtu (high heat release rate).

These emissions limits apply at all times, including periods of startup, shutdown, and malfunction, and compliance with these emissions limits is determined based on a 30-day rolling average.

[40 CFR 60.44b(a) and (h), 8/14/01]

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Permittee: Idaho Supreme Potatoes, Inc.

Date Issued: April 22, 2002

Location: Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy

Date Expires: April 22, 2007

Monitoring and Recordkeeping Requirements

3.5 Performance Testing and Monitoring for Particulate Matter

Compliance with PM and opacity standards under 40 CFR 60.43b shall be determined in accordance with 40 CFR 60.46b(d) and as required in 40 CFR 60.8, General Provision I, and IDAPA 58.01.01.157. Within 60 days of achieving the maximum production rate of the boiler, but not later than 180 days after issuance of this permit, the permittee shall conduct performance tests when firing No. 5 residual oil to measure PM emissions from the emissions stack of Boiler No. 4 to demonstrate compliance with the corresponding emissions limits in Permit Condition 3.2 of this permit.

[40 CFR 60.46b(d), 4/10/01]

A CEMS for measuring opacity from the emissions stack of Boiler No. 4 shall be installed, maintained, and operated by the permittee.

[40 CFR 60.48b(a), 4/10/01]

3.6 Fuel Receipts for Very Low Sulfur Fuel

When combusting fuel oil, the permittee shall comply with 40 CFR 60.49b(r), which states, "The owner or operator of an affected facility who elects to demonstrate that the affected facility combusts only very low sulfur oil under 40 CFR 60.42b(j)(2) shall obtain and maintain at the affected facility fuel receipts from the fuel supplier that certify that the oil meets the definition of distillate oil as defined in 60.41b."

The facility may also demonstrate compliance with the sulfur dioxide emission standards in Permit Condition 3.3 through alternative methods in accordance with 40 CFR 60.45b.

[40 CFR 60.45b, 12/18/89]

3.7 Performance Testing and Monitoring for Nitrogen Oxides

In accordance with 40 CFR 60.46b(e); 40 CFR 60.8, General Provision I; and IDAPA 58.01.01.157, within 60 days of achieving the maximum production rate of the boiler, but not later than 180 days after issuance of this permit, the permittee shall conduct initial compliance tests, when firing natural gas and residual oil, to measure NO_x emissions from the emissions stack of Boiler No. 4 to demonstrate compliance with the corresponding emissions limits in Permit Condition 3.4 of this permit.

[40 CFR 60.46b(e)(1), 4/10/01]

Following the initial performance test, the permittee shall, upon request, determine compliance with the emission limits in Permit Condition 3.3.3 and the appendix through the use of a 30-day performance test. During periods when performance tests are not requested, NO_x emissions data will be collected and used to prepare excess emission reports, but will not be used to determine compliance with the NO_x emission standards as stated in 40 CFR 60.48b(e)(4).

[40 CFR 60.46b(e)(4), 4/10/01]

In accordance with 40 CFR 60.48b, the permittee shall monitor NO_x emissions discharged to the atmosphere from the Boiler No. 4 stack.

[40 CFR 60.48b, 4/10/01]

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Date Issued: April 22, 2002

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3.8 Residual Oil Nitrogen Content

The permittee shall maintain records of the nitrogen content of the residual oil combusted in Boiler No. 4 and calculate the average fuel nitrogen content on a per calendar quarter basis in accordance with 40 CFR 60.49b(e). The records shall be kept onsite for the most recent two-year period and shall be made available to Department representatives upon request.

[40 CFR 60.49b(e), 3/13/00]

3.9 Fuel Combustion Records

The permittee shall record the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for all fuels burned during each calendar quarter in accordance with 40 CFR 60.49b(d). The annual capacity factor is determined on a 12-month rolling average basis. The records shall be kept onsite for the most recent two-year period and shall be made available to Department representatives upon request.

[40 CFR 60.49b(d), 3/13/00]

3.10 Opacity Records

The permittee shall maintain records of opacity in accordance with 40 CFR 60.49(f). The records shall be kept onsite for the most recent two-year period and shall be made available to Department representatives upon request.

[40 CFR 60.49b(f), 3/13/00]

Reporting Requirements

3.11 New Source Performance Standard Reporting Requirements

All applicable NSPS reporting requirements shall be submitted to the Department and the EPA.

[40 CFR 60.49b, 3/13/00, and 40 CFR 60.48c, 10/17/00]

3.12 Performance Test Protocol

The permittee is strongly encouraged to submit to the Department a test protocol for the performance tests required in Permit Condition 3 for review at least 30 days prior to the test days.

[IDAPA 58.01.01.157.01.a, 4/5/00]

3.13 Performance Test Report

The permittee shall submit a report of the results of the performance tests required in Permit Condition 3 of this permit, including all required process data, to the Department within 30 days after the date on which the actual stack testing is concluded.

[IDAPA 58.01.01.157.04, 4/5/00]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 011-00013

Permittee: Idaho Supreme Potatoes, Inc.

Date Issued: April 22, 2002

Location: Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy

Date Expires: April 22, 2007

4. BOILER NO. 3

4.1 Process Description

Boiler No. 3 is used in the dehydration process and has a maximum rated heat capacity of approximately 43.03 MMBtu/hr.

Emissions Limits

4.2 Emission Limits

Emissions of criteria pollutants, including particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) and sulfur dioxide (SO₂) from Boiler No. 3 shall not exceed any applicable emissions limit listed in Table 7.1 in the appendix.

[IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

4.3 Operating Hours - Boiler No. 3

The permittee shall operate Boiler No. 3 for a period not to exceed 3,185 hours per consecutive 12-month period.

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

4.4 Operations Parameters Monitoring

The permittee shall monitor and record the total hours of operation of Boiler No. 3 in hours per consecutive 12-month period. This information shall be kept onsite for the most recent two-year period and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

New Source Performance Standards

Emissions of PM and SO₂ from Boiler No. 3 are subject to 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

4.5 Standards for Particulate Matter

When combusting oil, opacity shall not exceed 20% (six-minute average), except for one six-minute period per hour of not more than 27% opacity. The opacity standard applies at all times, except during periods of startup, shutdown, or malfunction.

[40 CFR 60.43c(c) and (d), 10/17/00]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 011-00013

Permittee: Idaho Supreme Potatoes, Inc.

Date Issued: April 22, 2002

Location: Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy

Date Expires: April 22, 2007

4.6 Standards for Sulfur Dioxide

The permittee shall demonstrate compliance with the SO₂ emission requirements of 40 CFR 60.42c by combusting fuel oils with a sulfur content of less than 0.5% by weight. Compliance with the fuel oil sulfur limit shall be determined on a 30-day rolling average basis.

- 4.7** The permittee may also demonstrate compliance with the SO₂ emission requirements through alternative methods in accordance with 40 CFR 60.42c. The SO₂ standards apply at all times, including periods of startup, shutdown, and malfunction.

[40 CFR 60.42c, 10/17/00]

Monitoring and Recordkeeping Requirements

4.8 Particulate Matter Performance Test

Compliance with PM and opacity standards under 40 CFR 60.43c shall be determined in accordance with 40 CFR 60.45c(a) and as required in 40 CFR 60.8, General Provision I, and IDAPA 58.01.01.157. EPA Method 9 shall be used for determining the opacity of stack emissions.

[40 CFR 60.45c(a)(7), 10/17/00]

A CEMS for measuring opacity from the emissions stack of Boiler No. 3 shall be installed, maintained, and operated by the permittee when burning residual oil.

[40 CFR 60.47c(a), 10/17/00]

4.9 Fuel Oil Sulfur Limits

The permittee shall demonstrate that the fuel oil sulfur content is 0.5% or less in accordance with 40 CFR 60.44c(g). The permittee may also demonstrate compliance with the SO₂ performance test requirements through alternative methods in accordance with 40 CFR 60.44c. These records shall be kept at the facility for a minimum period of two years and shall be made available to Department representatives upon request.

[40 CFR 60.44c, 10/17/00]

4.10 Fuel Combustion Records

The permittee shall record the amounts of each fuel combusted during each day. This information shall be kept onsite for the most recent two-year period and shall be made available to Department representatives upon request.

[40 CFR 60.48c(g), 10/17/00]

Reporting Requirements

4.11 New Source Performance Standard Reporting Requirements

All applicable NSPS reporting requirements shall be submitted to the Department and the EPA.

[40 CFR 60.49b, 3/13/00, and 40 CFR 60.48c, 10/17/00]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 011-00013

Permittee: Idaho Supreme Potatoes, Inc.

Date Issued: April 22, 2002

Location: Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy

Date Expires: April 22, 2007

4.12 Performance Test Protocol

The permittee is strongly encouraged to submit to the Department a test protocol for the performance tests required in Permit Condition 4 for review at least 30 days prior to the test days.

[IDAPA 58.01.01.157.01.a, 4/5/00]

4.13 Performance Test Report

The permittee shall submit a report of the results of the performance tests required in Permit Condition 4, including all required process data, to the Department within 30 days after the date on which the actual stack testing is concluded.

[IDAPA 58.01.01.157.04, 4/5/00]

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 011-00013

Permittee: Idaho Supreme Potatoes, Inc.

Date Issued:

April 22, 2002

Location: Firth Facility – Corner of Hwy 91 and 800 N Goshen Hwy

Date Expires:

April 22, 2007

5. DRYERS AND OTHER NATURAL GAS-BURNING EQUIPMENT

5.1 Process Description

The facility utilizes one dryer with three stages (A, B, and C), one secondary dryer, three industrial space heaters, and other miscellaneous space heaters in the dehydration process. This equipment burns natural gas, with LPG used as a backup fuel.

Emissions Limits

5.2 Criteria Pollutants

Emissions of PM₁₀ and SO₂ from the listed natural gas-burning equipment shall not exceed any applicable emissions limit listed in Table 7.1 in the appendix.

[IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

5.3 Operating Hours

The permittee shall operate the three industrial space heaters and the miscellaneous space heaters for a period not to exceed 6,048 hours each per consecutive 12-month period.

[IDAPA 58.01.01.405.01, 5/1/94]

5.4 Fuel Throughput - Fluidized Bed Dryer

The maximum amount of natural gas burned in the fluidized bed dryer shall not exceed 6,843 standard cubic feet per hour (scf/hr). The maximum amount of LPG burned shall not exceed 78 gallons per hour (gal/hr).

[IDAPA 58.01.01.405.01, 5/1/94]

5.5 Fuel Throughput - Dryers A, B, C and Secondary Dryer

The combined maximum amount of natural gas burned in the dryers A, B, C and the secondary dryer shall not exceed 53,000 scf/hr. The combined maximum amount of LPG burned shall not exceed 253 gal/hr.

[IDAPA 58.01.01.405.01, 5/1/94]

5.6 Fuel Throughput - Industrial Space Heaters

The combined maximum amount of natural gas burned in the industrial space heaters shall not exceed 41,235 scf/hr. The combined maximum amount of LPG burned shall not exceed 174 gal/hr.

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

5.7 The permittee shall record the following parameters in a quarterly record to verify compliance with Permit Conditions 5.3 through 5.6. The records shall be kept at the facility for a minimum period of two years and shall be made available to Department representatives upon request.

5.7.1 Number of hours each industrial space heater is operated per consecutive 12-month period.

5.7.2 Hourly amount of natural gas and LPG used in each of the following equipment: fluidized bed dryer; Dryers A, B, and C; secondary dryer; and industrial space heaters.

[IDAPA 58.01.01.405.01, 5/1/94]

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Date Issued: April 22, 2002

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6. PROCESS DEHYDRATION LINES

6.1 Process Description

Raw potatoes are received at the facility and traverse through several pre-processing steps including peeling and slicing. After these initial steps, the potatoes are dehydrated to produce several final products. This section permits particulate emissions from the dehydration process and associated storage silos.

Emissions Limits

6.2 Particulate Matter Emissions Limits

Emissions of PM and PM₁₀ from the process dehydration lines and storage silos shall not exceed the pounds per hour or tons per any consecutive 12-month period values in Table 7.1 in the appendix.

[IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

6.3 Throughput

The total clean raw potatoes processed shall not exceed a rate of 868 tons per day, nor shall it exceed 287,000 tons per consecutive 12-month period.

The total aggregate throughput of the ten storage silos shall not exceed 1,152 tons per day.

[IDAPA 58.01.01.405.01, 5/1/94]

Monitoring and Recordkeeping Requirements

6.4 The permittee shall record the calendar date and the daily and consecutive 12-month period throughput of each potato process line in operation, and the daily aggregate throughput of the storage silos to verify compliance with Permit Condition 6.3. The records shall be kept at the facility for a minimum period of five years and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

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7. APPENDIX

The table below lists all emission rate limits the facility must comply with.

Table 7.1 EMISSIONS LIMITS

Idaho Supreme Potatoes, Firth Facility Emission Limits ^a – Hourly (lb/hr) and Annual ^b (T/yr)				
Source Description	Hourly PM ₁₀ ^c Emissions (lb/hr)	Annual PM ₁₀ ^c Emissions (T/yr)	SO ₂	
			lb/hr	T/yr
Boiler No. 3	2.30	3.70	16.0	25.0
Fluidized Bed Dryer	0.76	3.30	4E-03	2E-02
Secondary Dryer	4.1E-03	0.02	3E-04	1E-03
Dryer – Stage A	5.9E-02	0.26	5E-03	2E-02
Dryer – Stage B	2.4E-02	0.10	2E-03	8E-03
Dryer – Stage C	2.4E-02	0.10	2E-03	8E-03
Space Heater - North	6.1E-02	0.18	5E-03	1.5E-02
Space Heater - South	6.1E-02	0.18	5E-03	1.5E-02
Space Heater - East	0.11	0.34	9E-03	2.7E-02
Misc. Space Heaters	1.5E-02	0.045	1E-03	3.5E-03
Aggregate Processing ^d	6.40	22.0	NA ^e	NA ^e

Notes:

^a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis

^b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates

^c includes condensibles

^d Aggregate processing emissions include emissions from material handling and throughput, and emissions from storage silos.

^e Not applicable

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The following table provides a summary of the emission inventory of the facility based on potential to emit. The emission inventory table is for informational purposes only.

Table 7.2 EMISSIONS INVENTORY^A

Source Description	Annual PM ₁₀ ^d Emissions(T/yr)	SO ₂	CO	SO ₂
		T/yr	T/yr	T/yr
Boiler No. 4	33.0	140.0	48.0	220.0
Boiler No. 3	3.70	18.0	5.60	25.0
Fluidized Bed Dryer	3.30	4.80	2.50	.02
Secondary Dryer	.018	0.26	0.20	.001
Dryer - Stage A	.260	2.80	2.90	.02
Dryer - Stage B	.100	1.10	1.10	.008
Dryer - Stage C	.100	1.10	1.10	.008
Space Heater - North	.180	2.40	2.00	.015
Space Heater - South	.180	2.40	2.00	.015
Space Heater - East	.340	4.50	3.80	.027
Misc. Space Heaters	.045	.63	0.	.0035
Aggregate Processing ^e	22.0	NA	NA	NA
Total Emissions	41.0	173.0	70.0	248.0

Notes:^a Emissions inventory and rates for air quality management purposes and do not represent an enforceable emission rate^b As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis^c As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates^d Includes condensibles^e Aggregate processing emissions include emissions from material handling and throughput, and emissions from storage silos^f Not applicable

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8. TIER II PERMIT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - 3.1 To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 3.2 At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. Performance tests (i.e.; air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

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The permittee shall submit to the Department for approval a proposed test date for **each** performance test required by this permit at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

10. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.